



In the Matter Of:

ERIK YODER

vs.

THE O'NEIL GROUP, LLC, et al.

SALLIE SHANAHAN

January 19, 2017

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

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4 ERIK YODER, *

5 Plaintiff, *

6 vs. * Civil Action

7 THE O'NEIL GROUP, LLC, * No. 8:16-CV-00900 DKC

8 et al., *

9 Defendants. *

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12 Oral Deposition of SALLIE SHANAHAN

13 Rockville, Maryland

14 Thursday, January 19, 2017

15 9:56 a.m.

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19 Job No.: WDC-111412

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21 Reported by: Vicki L. Forman

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1 Oral Deposition of SALLIE SHANAHAN, held at
2 the offices of:

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4 DTI Deposition Services
5 21 Church Street, Suite 150
6 Rockville, Maryland 20850
7 (301) 762-8282

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11 Pursuant to agreement, before Vicki L.
12 Forman, Court Reporter and Notary Public in and for the
13 State of Maryland.

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1 A P P E A R A N C E S

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E X H I B I T S

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(Retained by Counsel)

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1 A I mean they're not pals.

2 Q I'm sorry, that's not the question.

3 Do you know if they still stay in touch?

4 A You know, I don't check up on who he's talked
5 to. I don't keep a tally of that.

6 Q So what was your role for MSO when it first
7 began?

8 A I was a processor.

9 Q And what does a processor do?

10 A A processor helps produce the documents that
11 are needed in a foreclosure. Yeah, in a foreclosure or
12 bankruptcy, whatever. They work -- yeah.

13 Q I'm sorry?

14 A They just help produce the documents.

15 Q Was there like a set of forms that you were
16 using?

17 A Well, there are forms in a foreclosure but
18 there's, you know, all kinds of different documents that
19 are needed.

20 Q What kind of documents would be needed if you
21 were going to foreclose on a home in Maryland?

22 A An assignment of mortgage, substitution of

1 we used their formalized training manuals and their
2 system.

3 Q I want to begin to now focus on what training
4 you received prior to Mr. Yoder beginning with MSO.

5 A Okay.

6 Q How many seminars or conferences did you
7 attend prior to Mr. Yoder beginning his employment?

8 A None. I mean I had been -- I had received
9 instruction but I hadn't -- we were a brand-new firm. I
10 was, you know, brand-new. We hadn't had a chance to do
11 that yet.

12 Q And you said you received instructions.
13 That would have been from the attorneys in
14 the office?

15 A Uh-huh.

16 Q Did you receive instructions from BSI?

17 A Yes.

18 Q And who at BSI would you have received
19 instructions from?

20 A Again Bethany, Dan. Dan was in Bethany's
21 office, yeah. Again, not a lot but he would tell me how
22 to do things but I don't think that was with MSO. I

1 foreclosure that you would perform?

2 A We would create documents. We would mail
3 documents. We would communicate with the outside --
4 with BSI. We would respond. I'm sure you're asking
5 about invoicing. I would create an invoice for our
6 clients.

7 Q You're referring to an invoice to BSI?

8 A Yes.

9 Q And you would prepare that?

10 A Yes.

11 Q The only invoices that you would prepare
12 would be to BSI?

13 A Yes. Well, yeah. Now, there might be an
14 outlier that I'm not thinking of but yes, that was my
15 job, do what it takes to process the foreclosure so
16 that's part -- you know, you got to get paid so that's
17 part of it.

18 Q Did MSO invoice every 30 days?

19 A We invoiced when we did something. At the
20 beginning we invoiced when something occurred.

21 Q Like an event?

22 A Yes, when something occurred. BSI had

1 be wrong so it was months. It was a very short time.

2 Q And you don't recall the period of time
3 between his separation and Mr. Yoder beginning?

4 A Very short. Very short.

5 Q And was Mr. Yoder hired to replace Kurt?

6 A He was hired to be the expert on foreclosure
7 processing in the state of Maryland and to be the
8 attorney that was going to be in charge of it and was
9 going to be the attorney that trained me. That was his
10 job.

11 Q Did you meet with Erik prior to his hiring?

12 A Nope, I was told that this is the guy that
13 you're going to work with.

14 Q Now, were there any other responsibilities
15 that you had that we're leaving out other than what
16 you've described?

17 A You might be hinting at something but I --

18 Q I'm not hinting. It's not a trick question.

19 A Okay, I really don't think that I've missed
20 something but -- I don't think I've missed something.

21 Q Okay. If you have in fact missed something
22 it would be a small amount of your overall